

It is my opinion that the FCC should begin a systematic review of tower and bird mortality issues. The communications industry should fund the review. Important issues to be looked at are: where the towers are placed in relation to the paths of migratory birds and design and lighting all of which have a great bearing on bird mortality rates.

In addition all existing tower sites should be reviewed to assess their placement and design in regard to migratory bird impacts.

Thirdly, all proposed towers should be subject to strict environmental reviews.

The FCC should also implement immediate protections based on existing knowledge, such as the voluntary tower siting and placement guidelines developed by the U.S. Fish and Wildlife Service.